

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**JACK STEPHEN PURSLEY,  
AKA STEVE PURSLEY**

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**NO. 4:18-CR-575 (HUGHES)**

**UNITED STATES' PROPOSED VOIR DIRE QUESTIONS**

The United States of America respectfully requests that the Court ask the following questions during voir dire in this case.

**United States' Requested Voir Dire Question No. 1**

Have you read or heard anything relating to this case from any source?

**United States' Requested Voir Dire Question No. 2**

Do you know or have you ever heard of the prosecuting attorneys in this case: Sean Beaty, Grace Albinson, and Jack Morgan?

**United States' Requested Voir Dire Question No. 3**

Do you know or have you ever heard of the defense attorneys, Michael Minns, Ashley Arnett, and Michael Ware?

**United States' Requested Voir Dire Question No. 4**

Do you know or have you ever heard of the defendant in this case: Attorney Jack Stephen Pursley?

**United States' Requested Voir Dire Question No. 5**

Do you know or have you ever heard of the following people who may or may not be called as witnesses in this case: [read United States' Anticipated Witness List]?

**United States' Requested Voir Dire Question No. 6**

The lead investigating agent in this case was IRS Special Agent Stephen Caivano. Do you know him?

**United States' Requested Voir Dire Question No. 7**

If so, would your dealings or your relationship with him affect your impartiality in this case?

**United States' Requested Voir Dire Question No. 8**

Have you, any of your family members, or any of your close friends ever been employed by or had any dealings with Southeastern Shipping Corporation, Gulf States Management Corporation, Four Sevens Investment Corporation, Diversified Land Holdings or Global American Properties, Inc.

**United States' Requested Voir Dire Question No. 9**

Do you possess any specialized training or education in petroleum production or oil rig staffing?

**United States' Requested Voir Dire Question No. 10**

Have you, any of your family members, or any of your close friends ever been employed in the petroleum production industry?

**United States' Requested Voir Dire Question No. 11**

This case involves the use of foreign bank accounts and foreign corporations. Do you hold any strong personal feelings or philosophical beliefs about the use of foreign bank accounts or foreign corporations that would prevent you from being fair and impartial in this case?

**United States' Requested Voir Dire Question No. 12**

During trial, you may hear evidence regarding large amounts of money – hundreds of thousands and even millions of dollars. Do any of you feel like hearing evidence regarding large amounts of money would somehow prevent you from being fair and impartial in this case?

**United States' Requested Voir Dire Question No. 13**

Do you, any of your family members, or any of your close friends possess any specialized training or education in accounting, law, tax, or a related field?

**United States' Requested Voir Dire Question No. 14**

Are you, any of your family members, or any of your close friends employed in the tax industry (*e.g.* tax preparation, public accounting, tax planning, *et cetera*)?

**United States' Requested Voir Dire Question No. 15**

Have you, any of your family members, or any of your close friends ever been an employee of the Internal Revenue Service (“IRS”) in any capacity?

**United States' Requested Voir Dire Question No. 16**

Have you, any of your family members, or any of your close friends ever been audited by the IRS?

How long ago was the audit or collection effort?

How was the audit (or collection effort) resolved?

Was the matter resolved to your (or their) satisfaction?

Were you (or they) treated fairly by the government?

Would your feelings prevent you from listening to the government's case impartially and rendering a verdict according to the evidence?

**United States' Requested Voir Dire Question No. 17**

Have you, any of your family members, or any of your close friends ever been involved in a legal action against the IRS or the United States government?

How long ago was the legal action?

How was the legal action resolved?

Was the matter resolved to your (or their) satisfaction?

Were you (or they) treated fairly throughout the legal process?

**United States' Requested Voir Dire Question No. 18**

Has a bank or other financial institution ever frozen an account belonging to you, any of your family members, or any of your close friends due to suspicious activity, regardless of whether any actual wrongdoing occurred?

How long ago did the freeze occur?

What were the circumstances surrounding the freeze?

Was the matter resolved to your satisfaction?

**United States' Requested Voir Dire Question No. 19**

Do you hold any strong personal feelings or beliefs about the tax system?

**United States' Requested Voir Dire Question No. 20**

Do you, any of your family members, or any of your close friends believe that the federal income tax system is unconstitutional, unfair, or otherwise need not be complied with?

**United States' Requested Voir Dire Question No. 21**

Do you, any of your family members, or any of your close friends belong to any organization engaged in any form of tax defiance or protest (*e.g.* We the People Foundation, Save-a-Patriot Fellowship, Freedom Above Fortune, *et cetera*)?

**United States' Requested Voir Dire Question No. 22**

Have you ever appeared as a witness in a criminal trial?

**United States' Requested Voir Dire Question No. 23**

Have you ever served as a juror in a civil or criminal case?

Did you serve as the foreman of the jury?

Was the jury able to reach a unanimous verdict in that case?

**United States' Requested Voir Dire Question No. 24**

Do you have any physical or mental limitation affecting your hearing, sight, alertness, attention, or similar function that would prevent you from giving your full attention to the evidence during this trial?

**United States' Requested Voir Dire Question No. 25**

During this trial, you may be asked to consider either direct or circumstantial evidence. "Direct evidence" is the testimony of one who asserts actual knowledge of a fact, such as an eye witness. "Circumstantial evidence" is proof of a chain of facts and circumstances indicating either the guilt or innocence of the defendant.

The law makes no distinction between the weight to be given to either direct or circumstantial evidence: it requires only that you weigh all of the evidence and be convinced of the defendant's guilt beyond a reasonable doubt before he can be convicted.

In deliberating in this case, can you give circumstantial evidence the same weight as direct evidence?

**United States' Requested Voir Dire Question No. 26**

The United States has the burden of proving defendant's guilt beyond a reasonable doubt. The United States is not required to prove the defendant's guilt "beyond all possible doubt" or "beyond a shadow of a doubt."

Do you understand that it is not necessary to prove the defendant's guilt "beyond all possible doubt" or "beyond a shadow of a doubt"?

Would you hold the United States to a higher burden of proof than proof beyond a reasonable doubt?

**United States' Requested Voir Dire Question No. 27**

In federal court, the jury determines the guilt or innocence of the defendant based on the evidence heard at trial. Should the jury return a verdict of guilty, the Court will decide the punishment. In federal court, punishment is a matter strictly for the court and is not to be considered by the jury in any way in arriving at a verdict.

Will you be unable to reach a verdict because you are not allowed to also consider the punishment?

**United States' Requested Voir Dire Question No. 28**

Do you hold any religious or philosophical beliefs that would make it difficult or impossible to return a verdict of guilty against a person charged with a crime, regardless of the circumstances?

**United States' Requested Voir Dire Question No. 29**

Do you disagree with the federal law to such a degree that you would not follow the law as given to you by the Court at the conclusion of this case?

**United States' Requested Voir Dire Question No. 30**

Do you have any reason why you could not render a true verdict or why you do not want to serve as a juror in this case?

**United States' Requested Voir Dire Question No. 31**

If there anything about you, other than what has already been disclosed, that, if you were selecting a jury, you would want to know about before picking the members of that jury?

Respectfully submitted,

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General  
U.S. Department of Justice  
Tax Division

Respectfully submitted,

RYAN K. PATRICK  
UNITED STATES ATTORNEY



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve a copy of this document on all counsel of record.

A handwritten signature in blue ink, reading "Sean Beaty", written over a horizontal line.

Sean Beaty  
Trial Attorney, Tax Division